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Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOSE PEDRO NAVA,

Defendant.

CASE NO. 2:24-CR-00054-DC

STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;
FINDINGS AND ORDER

DATE: April 4, 2025
TIME: 9:00 a.m.
COURT: Hon. Dena Coggins

STIPULATION

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for status on April 4, 2025.
2. By this stipulation, defendant now moves to continue the status conference until April 18, 2025, and to exclude time between April 4, 2025, and April 18, 2025, under Local Code T4.
3. The parties agree and stipulate, and request that the Court find the following:
 - a) The parties have met and conferred regarding potential case resolution, and those conversations are ongoing. Since the last requested continuance, the parties met again and continue to discuss potential resolution and other issues. Additionally, both parties are investigating facts relevant to their respective sentencing recommendations.
 - b) Defense counsel has indicated that the defendant is likely to accept the

government's plea offer and enter a change of plea at the next hearing. However, undersigned defense counsel is unavailable on April 4, 2025, and as he has been the primary counselor for the defendant, undersigned defense counsel wishes to appear with the defendant in person for his change of plea hearing on the requested date of April 18, 2025.

c) Counsel for defendant believes that failure to grant the above-requested continuance would deny him/her the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

d) The government joins in this request.

e) Based on the above-stated findings, the ends of justice served by continuing the case as requested outweigh the interest of the public and the defendant in a trial within the original date prescribed by the Speedy Trial Act.

f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period of April 4, 2025 to April 18, 2025, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4] because it results from a continuance granted by the Court at defendant's request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: April 1, 2025

MICHELE BECKWITH
Acting United States Attorney

/s/ EMILY G. SAUVAGEAU
EMILY G. SAUVAGEAU
Assistant United States Attorney

1 Dated: April 1, 2025

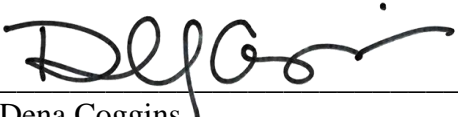
/s/ ALLEN SAWYER
ALLEN SAWYER
Counsel for Defendant
JOSE PEDRO NAVA

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5 **ORDER**

6 **IT IS HEREBY ORDERED** that the Status Conference scheduled for April 4, 2025, at 9:30
7 a.m. is VACATED and RESET for April 18, 2025 at 9:30 a.m. in Courtroom 8 before the Honorable
8 Dena M. Coggins. The time period between April 4, 2025 and April 18, 2025 inclusive, is excluded
9 under the Speedy Trial Act pursuant to 18 U.S.C. § 3161(h)(7)(A) and (B)(i) and (iv) [Local Code T4], as
10 the ends of justice served by granting the continuance outweigh the best interest of the public and the
11 defendants in a speedy trial.
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15 IT IS SO ORDERED.

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17 Dated: April 1, 2025


Dena Coggins
United States District Judge